IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Case No.: 5-22-00288-MJC

In Re:

JULIENNE MULLETTE, : Chapter 13

Debtor(s) :

US BANK TRUST NATIONAL ASSOCIATION, :

NOT IN ITS INDEIVDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET TRUST C/O FAY SERVICING LLC,

Movant(s)

Vs.

JULIENNE MULLETTE,

Debtor/Respondent :

JACK N. ZAHAROPOULOS,

Trustee/Respondent

.....

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW COMES, Julienne Mullette, Debtor, by and through her attorney, John J.

Martin, and file this Response as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Denied and strict proof thereof is demanded at trial.
- 8. Denied and strict proof thereof is demanded at trial.
- 9. Denied and strict proof thereof is demanded at trial.
- 10. Denied and strict proof thereof is demanded at trial.
- 11. Denied and strict proof thereof is demanded at trial.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion

for Relief and for such other and further relief as the Court deems just and proper.

Dated: 08/10/2023 Respectfully Submitted,

____/s/____

John J. Martin, Esquire 1022 Court Street Honesdale, PA 18431 (570) 253-6899 Attorney for Debtor jmartin@martin-law.net